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Attorneys for Defendants Hargett Materials, Inc.,
Jon Hargett, Tom Martin, Leanne Martin, and
Knights Consulting & Technical Services, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GST INTERNATIONAL, INC., a Nevada
corporation,

Plaintiff,

v.

TOM MARTIN, an individual; BRANDON
RAPOLLA, an individual; KNIGHTS
CONSULTING & TECHNICAL SERVICES,
INC., a Nevada corporation; LEANNE MARTIN,
an individual; HARGETT MATERIALS, INC., a
Tennessee corporation; JOHN HARGETT, an
individual; and DOES 1 through 50, inclusive;

Defendants.

Case No. 3:21-cv-00285-MMD-CLB

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
RESPOND TO FIRST AMENDED
COMPLAINT**

WHEREAS, on August 25, 2021, Plaintiff filed its First Amended Complaint ("FAC") in
this matter;

WHEREAS, the answer or other responsive pleading to the FAC is presently due (as to all
defendants who have been served) on September 20, 2021;

WHEREAS, counsel for Defendants Hargett Materials, Inc., Jon Hargett, Tom Martin,
Leanne Martin, and Knights Consulting & Technical Services, Inc. ("Defendants") recently
completed a multi-day jury trial and has not yet had the opportunity to complete Defendants'
response to the FAC;

NOW, therefore, the parties STIPULATE and AGREE as follows:

1 1. The deadline for Defendants to respond to the FAC shall be continued by two
2 weeks, from September 20, 2021 to October 4, 2021.

3 Pursuant to LR IA 6-1, the parties state that this is the first extension of the deadline to
4 respond to the FAC (since such deadline was originally set), and the third extension of any
5 deadline sought in this case. Good cause exists for this stipulation, as defense counsel recently
6 completed a multi-day jury trial and has not yet had the opportunity to complete Defendants'
7 response to the FAC. Pursuant to LR 26-3, the parties note that this stipulation does not seek an
8 extension of discovery, and no discovery has been conducted due to the current posture of the
9 case. The parties submit this stipulation not for purposes of delay, but for the reasons set forth
10 above.

11 **IT IS SO AGREED.**

12 Dated: September 17, 2021

FENNEMORE CRAIG, P.C.

13 /s/ Shannon S. Pierce

14 Shannon S. Pierce, Esq. (NV Bar No. 12471)
15 7800 Rancharrah Parkway
16 Reno, Nevada 89511

17 Attorneys for Defendants

18 Hargett Materials, Inc., Jon Hargett, Tom Martin,
19 Leanne Martin, and Knights Consulting & Technical
20 Services, Inc.

21 Dated: September 17, 2021

WOODBURN AND WEDGE

22 /s/ Dane W. Anderson

23 Dane W. Anderson, Esq. (NV Bar No. 6883)
24 Shay L. Wells, Esq. (NV Bar No. 12130)
25 Patrick M. Kealy, Esq. (NR Bar No. 13517)
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27 Reno, NV 89511

28 Attorneys for Plaintiff

For good cause based upon the parties' stipulation as set forth above, the parties'
stipulation is hereby **GRANTED**.

DATED this 17th day of September, 2021.


UNITED STATES MAGISTRATE JUDGE

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